

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
NORTHERN DIVISION**

**JOHNATHAN YASEVICH, et al., Each  
Individually and on Behalf of All Others Similarly  
Situated**

**PLAINTIFFS**

**CASE NO. 3:20-cv-19-KGB**

**THE HERITAGE COMPANY, INC.,  
and SANDRA FRANECKE**

**DEFENDANTS**

**DEFENDANTS' MOTION IN LIMINE**

COMES NOW Defendants, The Heritage Company, Inc. and Sandra Franecke (collectively "Defendants"), by and through their attorneys, the Davidson Law Firm, and for their Motion in Limine ("Motion") state as follows:

1. Defendants anticipate that Plaintiffs may attempt to present certain inadmissible evidence during the trial in this matter. As such, Defendants bring this Motion before the Court in order to reduce rulings on the admissibility of such evidence as it arises during the trial.

2. Defendants have contemporaneously filed a Brief in Support of this Motion and incorporate it herein in its entirety.

3. Defendants ask this Court to rule the following topics are inadmissible evidence that the Plaintiffs, their attorneys, and their witnesses are prohibited from referencing during trial:

- a. Any information or exhibits that have not been disclosed by Plaintiffs in their responses to the written discovery or via the depositions in this matter.

- b. Any cause of action, claim, defense, or element of damage not properly pleaded and subjected to discovery or not properly before the Court as finder of fact. As well as any matters irrelevant to any properly pleaded claims.
- c. Any hearsay as defined by F.R.E. 801 and not subject to a valid exception.
- d. Any mention or reference to transactions or communications, including but not limited to letter, emails, text messages, etc., between Defendants and Defendants' attorneys, including conversations and all transactions related thereto, for which Defendants claim the attorney-client privilege.
- e. Any mention or reference to Defendants' offering or promising to furnish any valuable consideration to compromise or attempt to compromise the claims made in the lawsuit which are disputed both as to validity and amount, together with any mention or reference of conduct or statements made in settlement negotiations.
- f. Plaintiffs and any witnesses should be prevented from testifying to any opinion not rationally based on the perception of the witness such as any allusion to a legal standard or conclusion as to the reasonableness or contractual compliance of any act of the Defendants.

- g. Plaintiffs should be prevented from introducing at trial any testimony or evidence, outside of the document itself, that attempts to explain the meaning of a term(s) in a document.
- h. Counsel for Plaintiffs should be prevented from making any arguments on an issue that is not going to be supported by facts introduced into evidence.
- i. Plaintiffs should be prevented from eliciting any expert testimony as no expert witnesses have been disclosed by Plaintiffs.
- j. Plaintiffs should be prevented from making any reference to any alleged actions of Defendants that would have occurred prior to the statute of limitations involved in this case.
- k. Plaintiffs should be prevented from introducing any testimony or evidence of other lawsuits the Defendants have been in or of which they are currently participating.
- l. Plaintiffs should be prevented from introducing testimony or evidence regarding the hours worked of other Plaintiffs or wages earned by other Plaintiffs as it relates to this lawsuit.
- m. Plaintiffs should be prevented from eliciting statements attributable to Defendants allegedly made to Plaintiffs by unknown speakers.
- n. Plaintiffs should be prevented from introducing the damage calculation they provided on May 31, 2023, which was part of their Second Supplemental Initial Disclosures Pursuant to Rule 26(a)(1).

**Attached as Exhibit A.**

WHEREFORE, Defendants respectfully request that the Court grant their Motion in Limine, and for all other proper relief to which they are entitled.

Respectfully submitted,

Charles Darwin “Skip” Davidson; ABN 73026  
Nickolas W. Dunn; ABN 2019115

**DAVIDSON LAW FIRM**  
724 Garland, Cantrell at State  
P.O. Box 1300  
Little Rock, AR 72201  
(501) 320-5132  
Fax: (501) 374-5917  
E-mail: skipd@dlf-ar.com  
nick.dunn@dlf-ar.com

**Attorneys for The Heritage Company,  
Inc. and Sandra Franecke**

#### **CERTIFICATE OF SERVICE**

I, Nickolas W. Dunn, do hereby certify that I have sent via Federal Court ECF System this 25<sup>th</sup> day of November 2023, a true and complete copy of the forgoing to the following individuals:

**Sean Short**  
**Josh Sanford**  
Sanford Law Firm  
650 S. Shackleford, Suite 411  
Little Rock, Arkansas 72211

Nickolas W. Dunn

Name	Change Program Damages	Liquidated Damages	WARN Damages	Total Damages
AMAYA, JEROL	\$ 6,587.50	\$ 6,587.50	\$ 7,140.00	\$ 20,315.00
ANDERSON, GABRIELL	\$ 5,407.50	\$ 5,407.50	\$ 2,520.00	\$ 13,335.00
AZUMARA, LIVINUS	\$ 5,783.46	\$ 5,783.46	\$ 3,240.00	\$ 14,806.93
BROWN, DETRICK	\$ 5,252.01	\$ 5,252.01	\$ 4,725.00	\$ 15,229.02
BROWN, MICHAEL	\$ 1,162.50	\$ 1,162.50	\$ 4,890.58	\$ 7,215.58
BURDESS, KATHY	\$ 3,875.00	\$ 3,875.00	\$ 4,200.00	\$ 11,950.00
BYRD, ASHLEY	\$ 120.00	\$ 120.00	\$ 2,400.00	\$ 2,640.00
CANNON, PAMELA	\$ 13,756.25	\$ 13,756.25	\$ 7,455.00	\$ 34,967.50
CHAGALA, MARNI	\$ 14,896.00	\$ 14,896.00	\$ 2,940.00	\$ 32,732.00
COFFER, JESSICA	\$ 3,188.44	\$ 3,188.44	\$ 4,890.58	\$ 11,267.46
COSTNER, KRISTIN	\$ 5,824.80	\$ 5,824.80	\$ 2,400.00	\$ 14,049.60
CROWE, ROXANNE	\$ 1,380.00	\$ 1,380.00	\$ 4,200.00	\$ 6,960.00
DENNEY, RONALD	\$ 1,466.67	\$ 1,466.67	\$ 2,400.00	\$ 5,333.33
DENNEY, RONNIE	\$ 1,337.50	\$ 1,337.50	\$ 2,400.00	\$ 5,075.00
DENNEY, SHERRI	\$ 3,679.02	\$ 3,679.02	\$ 2,640.00	\$ 9,998.04
DICKERSON, KAILEY	\$ 690.00	\$ 690.00	\$ 2,400.00	\$ 3,780.00
DOZIER, GARY	\$ 2,325.00	\$ 2,325.00	\$ 4,890.58	\$ 9,540.58
DUNBAR, STEPHANIE	\$ 1,336.88	\$ 1,336.88	\$ 7,245.00	\$ 9,918.75
FISHER, MEGAN	\$ 2,906.25	\$ 2,906.25	\$ 5,250.00	\$ 11,062.50
FOLLOWELL, ADAM	\$ 8,169.79	\$ 8,169.79	\$ 8,400.00	\$ 24,739.58
GAMMONS, PAULA	\$ 2,034.38	\$ 2,034.38	\$ 7,350.00	\$ 11,418.75
GOODRUM, AMY	\$ 1,178.75	\$ 1,178.75	\$ 2,460.00	\$ 4,817.50
GRAY, CEDRICK	\$ 1,390.44	\$ 1,390.44	\$ 2,400.00	\$ 5,180.87
GRIMES, KATRINA	\$ 6,302.41	\$ 6,302.41	\$ 6,480.00	\$ 19,084.82
GROSS, DANIELLE	\$ 4,668.45	\$ 4,668.45	\$ 4,800.00	\$ 14,136.90
GURNSEY, MONICA	\$ 7,565.94	\$ 7,565.94	\$ 7,455.00	\$ 22,586.88
HATCHER, HEATH	\$ 8,286.50	\$ 8,286.50	\$ 8,520.00	\$ 25,093.01
HAYES, JAY	\$ 4,168.49	\$ 4,168.49	\$ 3,060.00	\$ 11,396.98
HENSLEY, KATHERINE	\$ 301.88	\$ 301.88	\$ 2,760.00	\$ 3,363.75
HOLMES, DESARAY	\$ 980.00	\$ 980.00	\$ 2,400.00	\$ 4,360.00
JACKSON, ALISON	\$ 5,425.00	\$ 5,425.00	\$ 3,360.00	\$ 14,210.00
JACKSON, LAQUISHA	\$ 1,503.17	\$ 1,503.17	\$ 2,400.00	\$ 5,406.35
JEFFERSON, TEHRELL	\$ 6,068.99	\$ 6,068.99	\$ 5,460.00	\$ 17,597.98
JONES, ARNELL	\$ 100.00	\$ 100.00	\$ 2,400.00	\$ 2,600.00
JONES, CHASTIEE	\$ 850.00	\$ 850.00	\$ 2,400.00	\$ 4,100.00
JONES, CHRISTINE	\$ 2,919.62	\$ 2,919.62	\$ 8,308.80	\$ 14,148.04
LEWIS, DYNASTIEE	\$ 3,188.44	\$ 3,188.44	\$ 4,890.58	\$ 11,267.46
LISKO, DANIELLE	\$ 1,660.50	\$ 1,660.50	\$ 2,460.00	\$ 5,781.00
LONG, JENNIFER	\$ 9,336.90	\$ 9,336.90	\$ 8,400.00	\$ 27,073.81
MCMULLEN, OWEN	\$ 1,910.30	\$ 1,910.30	\$ 4,515.00	\$ 8,335.60
MILAM, AIMEE	\$ 3,429.05	\$ 3,429.05	\$ 5,520.00	\$ 12,378.11

MURPHY, TIAUNA	\$ 3,275.04	\$ 3,275.04	\$ 2,520.00	\$ 9,070.08
NELSON, SIERRA	\$ 550.00	\$ 550.00	\$ 2,400.00	\$ 3,500.00
NORMAN, CHARLOTTE	\$ 8,403.21	\$ 8,403.21	\$ 8,640.00	\$ 25,446.43
PARNELL, STEPHEN	\$ 7,469.52	\$ 7,469.52	\$ 7,680.00	\$ 22,619.05
PERRY, CHARLES	\$ 2,743.29	\$ 2,743.29	\$ 2,400.00	\$ 7,886.59
PERRY, LAURA	\$ 7,392.00	\$ 7,392.00	\$ 4,410.00	\$ 19,194.00
REED, KATIE	\$ 4,536.00	\$ 4,536.00	\$ 5,760.00	\$ 14,832.00
REID, NICOLE	\$ 840.00	\$ 840.00	\$ 4,200.00	\$ 5,880.00
RICE, AMBER	\$ 15,345.00	\$ 15,345.00	\$ 7,560.00	\$ 38,250.00
ROSE, LONNA	\$ 11,625.00	\$ 11,625.00	\$ 6,300.00	\$ 29,550.00
SINGLETON, MAUREEN	\$ 2,325.00	\$ 2,325.00	\$ 4,890.58	\$ 9,540.58
SMITH, BRANDY	\$ 165.00	\$ 165.00	\$ 2,400.00	\$ 2,730.00
STIEL, DAISY	\$ 2,921.25	\$ 2,921.25	\$ 4,305.00	\$ 10,147.50
STONECIPHER, KADI	\$ 4,517.86	\$ 4,517.86	\$ 6,000.00	\$ 15,035.71
STRINGER, JOSHUA	\$ 300.00	\$ 300.00	\$ 2,400.00	\$ 3,000.00
THOMASON, SHELLY	\$ 8,870.06	\$ 8,870.06	\$ 7,980.00	\$ 25,720.12
THROGMARTIN, CORE	\$ 8,169.79	\$ 8,169.79	\$ 8,400.00	\$ 24,739.58
TODD, KRYSTAL	\$ 2,175.00	\$ 2,175.00	\$ 2,400.00	\$ 6,750.00
UNDERWOOD, LARRY	\$ 7,002.68	\$ 7,002.68	\$ 6,300.00	\$ 20,305.36
WALTON, RUBY	\$ -	\$ -	\$ 6,960.00	\$ 6,960.00
WATTS, ASHLEY	\$ 5,602.14	\$ 5,602.14	\$ 5,760.00	\$ 16,964.29
WEEKS, SHERRY	\$ 5,192.50	\$ 5,192.50	\$ 7,035.00	\$ 17,420.00
WELCH, KIANA	\$ 50.00	\$ 50.00	\$ 2,400.00	\$ 2,500.00
WEST, ANDREW	\$ 420.00	\$ 420.00	\$ 2,880.00	\$ 3,720.00
WEST, ASHLEY	\$ 13,950.00	\$ 13,950.00	\$ 7,560.00	\$ 35,460.00
WHITENER, HEATHER	\$ 5,602.14	\$ 5,602.14	\$ 5,760.00	\$ 16,964.29
WILLIAMS, BERTHA	\$ 8,884.06	\$ 8,884.06	\$ 9,134.40	\$ 26,902.53
WILLIAMS, CHANELL	\$ 4,901.88	\$ 4,901.88	\$ 4,410.00	\$ 14,213.75
WILMOTH, ROBERT	\$ 275.00	\$ 275.00	\$ 2,400.00	\$ 2,950.00
WILSON, LILLIAN	\$ 4,668.45	\$ 4,668.45	\$ 4,200.00	\$ 13,536.90
WILSON, WALLIS	\$ 8,169.79	\$ 8,169.79	\$ 7,350.00	\$ 23,689.58
WOOD, JANA	\$ 5,909.38	\$ 5,909.38	\$ 6,405.00	\$ 18,223.75
WOODS, JOHNATHAN	\$ 1,896.25	\$ 1,896.25	\$ 2,460.00	\$ 6,252.50
WYMAN, REBEKAH	\$ 4,030.00	\$ 4,030.00	\$ 5,460.00	\$ 13,520.00
YASEVICH, JOHNATHAN	\$ 7,469.52	\$ 7,469.52	\$ 6,720.00	\$ 21,659.05
ZAMUDIO, SHYNNAH	\$ 8,081.09	\$ 8,081.09	\$ 8,308.80	\$ 24,470.98
<b>TOTAL:</b>	<b>\$ 346,141.69</b>	<b>\$ 346,141.69</b>	<b>\$ 376,574.92</b>	<b>\$ 1,068,858.30</b>

Bates No.	Dept. #	Employee #	Name	First Name	Last Name	On Lawsuit	Wks Worked	Hire Date?	Term Date	Pay Freq.	Loc Code	Hourly Rate	Weekly Unpaid Hours	OT Owed for Downtime	Liquidated Damages
						t									
358	7815	54593	AMAYA, JEROL	JEROL	AMAYA	1	155	2/15/2006	12/20/2019	w	F CORP	\$ 17.00	2.50	\$ 6,587.50	\$ 6,587.50
358	6002	84259	ANDERSON, GABRIELLE	GABRIELLE	ANDERSON	1	103	1/4/2018	12/20/2019	w	p JONES	\$ 10.50	5.00	\$ 5,407.50	\$ 5,407.50
358	7815	64259	AZUMARA, LIVINUS	LIVINUS	AZUMARA	1	114	10/16/2017	12/20/2019	w	p CORP	\$ 13.50	3.76	\$ 5,783.46	\$ 5,783.46
358	969	66036	BROWN, DETRICK	DETRICK	BROWN	1	155	7/10/2016	12/20/2019	w	F SEARC	\$ 11.25	3.01	\$ 5,252.01	\$ 5,252.01
			BROWN, MICHAEL	MICHAEL	BROWN		155	4/1/2013	12/20/2019		F	\$ 10.00	0.75	\$ 1,162.50	\$ 1,162.50
358	901	20676	BURDESS, KATHY	KATHY	BURDESS	1	155	12/3/2015	12/20/2019	w	F SEARC	\$ 10.00	2.50	\$ 3,875.00	\$ 3,875.00
358	63	76996	BYRD, ASHLEY	ASHLEY	BYRD	1	2	12/9/2019	12/20/2019	w	p CORP	\$ 9.25	6.00	\$ 120.00	\$ 120.00
358	6003	73902	CANNON, PAMELA	PAMELA	CANNON	1	155	2/20/2012	12/20/2019	w	F JONES	\$ 17.75	5.00	\$ 13,756.25	\$ 13,756.25
358	901	83990	CHAGALA, MARNI	MARNI	CHAGALA	1	152	1/25/2017	12/20/2019	w	p SEARC	\$ 12.25	8.00	\$ 14,896.00	\$ 14,896.00
			COFFER, JESSICA	JESSICA	COFFER		105.86				F	\$ 10.00	3.01	\$ 3,188.44	\$ 3,188.44
358	6003	78452	COSTNER, KRISTIN	KRISTIN	COSTNER	1	155	10/17/2014	12/20/2019	w	p JONES	\$ 10.00	3.76	\$ 5,824.80	\$ 5,824.80
358	901	33641	CROWE, ROXANNE	ROXANNE	CROWE	1	46	2/8/2019	12/20/2019	w	F SEARC	\$ 9.50	3.00	\$ 1,380.00	\$ 1,380.00
358	6002	83850	DENNEY, RONALD	RONALD	DENNEY	1	88	4/16/2018	12/20/2019	w	p JONES	\$ 10.00	1.67	\$ 1,466.67	\$ 1,466.67
358	6002	83782	DENNEY, RONNIE	RONNIE	DENNEY	1	107	12/5/2017	12/20/2019	w	p JONES	\$ 10.00	1.25	\$ 1,337.50	\$ 1,337.50
358	6002	85002	DENNEY, SHERRI	SHERRI	DENNEY	1	89	4/10/2018	12/20/2019	w	p JONES	\$ 11.00	3.76	\$ 3,679.02	\$ 3,679.02
358	7809	85298	DICKERSON, KAILEY	KAILEY	DICKERSON	1	23	7/15/2019	12/20/2019	w	p CORP	\$ 9.50	3.00	\$ 690.00	\$ 690.00
			DOZIER, GARY	GARY	DOZIER		155	6/1/2001	12/20/2019		F	\$ 10.00	1.50	\$ 2,325.00	\$ 2,325.00
358	901	69350	DUNBAR, STEPHANIE	STEPHANIE	DUNBAR	1	155	6/23/2008	12/20/2019	w	F SEARC	\$ 17.25	0.50	\$ 1,336.88	\$ 1,336.88
358	114	76198	FISHER, MEGAN	MEGAN	FISHER	1	155	12/12/2011	12/20/2019	w	F CORP	\$ 12.50	1.50	\$ 2,906.25	\$ 2,906.25
358	6099	14733	FOLLOWELL, ADAM	ADAM	FOLLOWELL	1	155	2/15/2000	12/20/2019	B	F JONES	\$ 17.50	3.01	\$ 8,169.79	\$ 8,169.79
358	901	66925	GAMMONS, PAULA	PAULA	GAMMONS	1	155	7/2/2007	12/20/2019	w	F SEARC	\$ 17.50	0.75	\$ 2,034.38	\$ 2,034.38
358	6002	38487	GOODRUM, AMY	AMY	GOODRUM	1	46	2/5/2019	12/20/2019	w	p JONES	\$ 10.25	2.50	\$ 1,178.75	\$ 1,178.75
358	7809	85618	GRAY, CEDRICK	CEDRICK	GRAY	1	37	4/1/2019	12/20/2019	w	p CORP	\$ 9.50	3.76	\$ 1,390.44	\$ 1,390.44
358	599	62789	GRIMES, KATRINA	KATRINA	GRIMES	1	155	3/6/2008	12/20/2019	B	F CORP	\$ 13.50	3.01	\$ 6,302.41	\$ 6,302.41
358	6099	81267	GROSS, DANIELLE	DANIELLE	GROSS	1	155	2/26/2015	12/20/2019	B	F JONES	\$ 10.00	3.01	\$ 4,668.45	\$ 4,668.45
359	1216	65200	GURNSEY, MONICA	MONICA	GURNSEY	1	155	10/21/2013	12/20/2019	w	F JONES	\$ 17.75	2.75	\$ 7,565.94	\$ 7,565.94
358	6003	26573	HATCHER, HEATH	HEATH	HATCHER	1	155	1/27/2003	12/20/2019	B	F JONES	\$ 17.75	3.01	\$ 8,286.50	\$ 8,286.50
359	7809	84470	HAYES, JAY	JAY	HAYES	1	87	4/24/2018	12/20/2019	w	p CORP	\$ 12.75	3.76	\$ 4,168.49	\$ 4,168.49
359	6002	77868	HENSLEY, KATHERINE	KATHERINE	HENSLEY	1	15	9/9/2019	12/20/2019	w	p JONES	\$ 11.50	1.75	\$ 301.88	\$ 301.88
359	6002	85191	HOLMES, DESARAY	DESARAY	HOLMES	1	28	6/10/2019	12/20/2019	w	p JONES	\$ 10.00	3.50	\$ 980.00	\$ 980.00
359	1208	79902	JACKSON, ALISON	ALISON	JACKSON	1	155	6/12/2014	12/20/2019	w	p JONES	\$ 14.00	2.50	\$ 5,425.00	\$ 5,425.00
359	7809	35412	JACKSON, LAQUISHA	LAQUISHA	JACKSON	1	40	3/18/2019	12/20/2019	w	p CORP	\$ 9.50	3.76	\$ 1,503.17	\$ 1,503.17
359	813	15294	JEFFERSON, TEHRELL	TEHRELL	JEFFERSON	1	155	10/17/2002	12/20/2019	w	F CORP	\$ 13.00	3.01	\$ 6,068.99	\$ 6,068.99
359	63	85853	JONES, ARNELL	ARNELL	JONES	1	2	12/9/2019	12/20/2019	w	p CORP	\$ 9.25	5.00	\$ 100.00	\$ 100.00
359	6002	80053	JONES, CHASTIEE	CHASTIEE	JONES	1	17	8/28/2019	12/20/2019	w	p JONES	\$ 9.25	5.00	\$ 850.00	\$ 850.00
358	94	31215	JONES, CHRISTINE	CHRISTINE	JONES	1	56	11/26/2018	12/20/2019	S	F CORP	\$ 17.31	3.01	\$ 2,919.62	\$ 2,919.62
			LEWIS, DYNASTIEE	DYNASTIEE	LEWIS		105.86				F	\$ 10.00	3.01	\$ 3,188.44	\$ 3,188.44
359	6002	85080	LISKO, DANIELLE	DANIELLE	LISKO	1	81	6/4/2018	12/20/2019	w	p JONES	\$ 10.25	2.00	\$ 1,660.50	\$ 1,660.50
359	113	65901	LONG, JENNIFER	JENNIFER	LONG	1	155	8/18/2010	12/20/2019	w	F CORP	\$ 20.00	3.01	\$ 9,336.90	\$ 9,336.90
359	813	4561	MCMULLEN, OWEN	OWEN	MCMULLEN	1	59	11/9/2018	12/20/2019	w	F CORP	\$ 10.75	3.01	\$ 1,910.30	\$ 1,910.30
358	7299	83835	MILAM, AIMEE	AIMEE	MILAM	1	99	2/1/2018	12/20/2019	B	F SEARC	\$ 11.50	3.01	\$ 3,429.05	\$ 3,429.05
359	6002	85065	MURPHY, TIAUNA	TIAUNA	MURPHY	1	83	5/22/2018	12/20/2019	w	p JONES	\$ 10.50	3.76	\$ 3,275.04	\$ 3,275.04
359	6002	85782	NELSON, SIERRA	SIERRA	NELSON	1	10	10/15/2019	12/20/2019	w	p JONES	\$ 10.00	5.50	\$ 550.00	\$ 550.00
358	115	26493	NORMAN, CHARLOTTE	CHARLOTTE	NORMAN	1	155	2/14/2014	12/20/2019	B	F CORP	\$ 18.00	3.01	\$ 8,403.21	\$ 8,403.21
358	901	64607	PARNELL, STEPHEN	STEPHEN	PARNELL	1	155	11/9/2007	12/20/2019	B	F SEARC	\$ 16.00	3.01	\$ 7,469.52	\$ 7,469.52
359	903	45921	PERRY, CHARLES	CHARLES	PERRY	1	73	8/1/2018	12/20/2019	w	p SEARC	\$ 9.25	3.76	\$ 2,743.29	\$ 2,743.29
359	901	83588	PERRY, LAURA	LAURA	PERRY	1	128	7/13/2017	12/20/2019	w	F SEARC	\$ 10.50	5.50	\$ 7,392.00	\$ 7,392.00
358	6002	84642	REED, KATIE	KATIE	REED	1	84	5/17/2018	12/20/2019	B	F JONES	\$ 12.00	4.50	\$ 4,536.00	\$ 4,536.00
359	902	85658	REID, NICOLE	NICOLE	REID	1	21	7/28/2019	12/20/2019	w	F SEARC	\$ 10.00	4.00	\$ 840.00	\$ 840.00
359	7815	74245	RICE, AMBER	AMBER	RICE	1	155	8/19/2012	12/20/2019	w	F CORP	\$ 18.00	5.50	\$ 15,345.00	\$ 15,345.00
359	6003	47192	ROSE, LONNA	LONNA	ROSE	1	155	1/6/2004	12/20/2019	w	F JONES	\$ 15.00	5.00	\$ 11,625.00	\$ 11,625.00
			SINGLETON, MAUREEN	MAUREEN	SINGLETON		155	12/1/2001	12/20/2019		F	\$ 10.00	1.50	\$ 2,325.00	\$ 2,325.00
359	6003	85848	SMITH, BRANDY	BRANDY	SMITH	1	3	12/2/2019	12/20/2019	w	p JONES	\$ 9.25	5.50	\$ 165.00	\$ 165.00
359	903	79362	STIEL, DAISY	DAISY	STIEL	1	57	11/22/2018	12/20/2019	w	F SEARC	\$ 10.25	5.00	\$ 2,921.25	\$ 2,921.25
358	6002	84084	STONECIPHER, KADI	KADI	STONECIPHER	1	120	9/10/2017	12/20/2019	B	F JONES	\$ 12.50	3.01	\$ 4,517.86	\$ 4,517.86
359	6002	85831	STRINGER, JOSHUA	JOSHUA	STRINGER	1	5	11/20/2019	12/20/2019	w	p JONES	\$ 10.00	6.00	\$ 300.00	\$ 300.00
359	105	6993	THOMASON, SHELLY	SHELLY	THOMASON	1	155	1/7/2004	12/20/2019	w	F CORP	\$ 19.00	3.01	\$ 8,870.06	\$ 8,870.06
358	6099	41843	THROGMARTIN, COREY	COREY	THROGMARTIN	1	155	2/21/2011	12/20/2019	B	F JONES	\$ 17.50	3.01	\$ 8,169.79	\$ 8,169.79
359	7809	81908	TODD, KRYSTAL	KRYSTAL	TODD	1	87	4/23/2018	12/20/2019	w	p CORP	\$ 9.25	2.50	\$ 2,175.00	\$ 2,175.00
359	827	4109	UNDERWOOD, LARRY	LARRY	UNDERWOOD	1	155	6/14/1999	12/20/2019	w	F CORP	\$ 15.00	3.01	\$ 7,002.68	\$ 7,002.68
358	85	10387	WALTON, RUBY	RUBY	WALTON	1	155	9/5/1998	12/20/2019	B	F CORP	\$ 14.50	0.00	\$ -	\$ -
358	7899	78694	WATTS, ASHLEY	ASHLEY	WATTS	1	155	5/6/2013	12/20/2019	B	F CORP	\$ 12.00	3.01	\$ 5,602.14	\$ 5,602.14
359	113	12340	WEEKS, SHERRY	SHERRY	WEEKS	1	155	1/12/2000	12/20/2019	w	F CORP	\$ 16.75	2.00	\$ 5,192.50	\$ 5,192.50
359	114	45037	WELCH, KIANA	KIANA	WELCH	1	10	10/14/2019	12/20/2019	w	p CORP	\$ 9.25	0.50	\$ 50.00	\$ 50.00
359	6003	73448	WEST, ANDREW	ANDREW	WEST	1	28	6/10/2019	12/20/2019	w	p JONES	\$ 12.00	1.25	\$ 420.00	\$ 420.00
359	1216	25854	WEST, ASHLEY	ASHLEY	WEST	1	155	9/8/2004	12/20/2019	w	F JONES	\$ 18.00	5.00	\$ 13,950.00	\$ 13,950.00
358	902	45780	WHITENER, HEATHER	HEATHER	WHITENER	1	155	3/31/2010	12/20/2019	B	F SEARC	\$ 12.00	3.01	\$ 5,602.14	\$ 5,602.14
358	599	11857	WILLIAMS, BERTHA	BERTHA	WILLIAMS	1	155	4/15/1999	12/20/2019	B	F CORP	\$ 19.03	3.01	\$ 8,884.06	\$ 8,884.06
359	105	77317	WILLIAMS, CHANELL	CHANELL	WILLIAMS	1	155	6/1/2015	12/20/2019	w	F CORP	\$ 10.50	3.01	\$ 4,901.88	\$ 4,901.88
359	902	84734	WILMOTH, ROBERT	ROBERT	WILMOTH	1	5	11/21/2019	12/20/2019	w	p SEARC	\$ 9.25	5.50	\$ 275.00	\$ 275.00
359	487	56895	WILSON, LILLIAN	LILLIAN	WILSON	1	155	6/7/2011	12/20/2019	w	F JONES	\$ 10.00	3.01	\$ 4,668.45	\$ 4,668.45
359	6003	56893	WILSON, WALLIS	WALLIS	WILSON	1	155	4/6/2005	12/20/2019	w	F JONES	\$ 17.50	3.01	\$ 8,169.79	\$ 8,169.79
359	7809	68068	WOOD, JANA	JANA	WOOD	1	155	10/3/2010	12/20/2019	w	F CORP	\$ 15.25	2.50	\$ 5,909.38	\$ 5,909.38
359	7809	41337	WOODS, JOHNATHAN	JOHNATHAN	WOODS	1	37	4/1/2019	12/20/2019	w	p CORP	\$ 10.25	5.00	\$ 1,896.25	\$ 1,896.25
360	903	81877	WYMAN, REBEKAH	REBEKAH	WYMAN	1	155	11/22/2015	12/20/2019	w	F SEARC	\$ 13.00	2.00	\$ 4,030.00	\$ 4,030.00
360	6003	80912	YASEVICH, JOHNATHAN	JOHNATHAN	YASEVICH	1	155	1/8/2015	12/20/2019	w	F JONES	\$ 16.00	3.01	\$ 7,469.52	\$ 7,469.52
358	94	75380	ZAMUDIO, SHYNNAH	SHYNNAH	ZAMUDIO	1	155								



Bates No.	Dept. #	Employee #	Name	First Name	Last Name	On Lawsuit	Wks Worked	Hire Date?	Term Date	Pay Freq.	Loc Code	Hourly Rate	WARN 60 Days	MATH CHECK
358	6099	14733	FOLLOWELL, ADAM	ADAM	FOLLOWELL	1	155	2/15/2000	12/20/2019	B	F JONES	\$ 17.50	\$ 8,400.00	\$ 8,400.00
358	599	62789	GRIMES, KATRINA	KATRINA	GRIMES	1	155	3/6/2008	12/20/2019	B	F CORP	\$ 13.50	\$ 6,480.00	\$ 6,480.00
358	6099	81267	GROSS, DANIELLE	DANIELLE	GROSS	1	155	2/26/2015	12/20/2019	B	F JONES	\$ 10.00	\$ 4,800.00	\$ 4,800.00
358	6003	26573	HATCHER, HEATH	HEATH	HATCHER	1	155	1/27/2003	12/20/2019	B	F JONES	\$ 17.75	\$ 8,520.00	\$ 8,520.00
358	7299	83835	MILAM, AIMEE	AIMEE	MILAM	1	99	2/1/2018	12/20/2019	B	F SEARC	\$ 11.50	\$ 5,520.00	\$ 5,520.00
358	115	26493	NORMAN, CHARLOTTE	CHARLOTTE	NORMAN	1	155	2/14/2014	12/20/2019	B	F CORP	\$ 18.00	\$ 8,640.00	\$ 8,640.00
358	901	64607	PARNELL, STEPHEN	STEPHEN	PARNELL	1	155	11/9/2007	12/20/2019	B	F SEARC	\$ 16.00	\$ 7,680.00	\$ 7,680.00
358	6002	84642	REED, KATIE	KATIE	REED	1	84	5/17/2018	12/20/2019	B	F JONES	\$ 12.00	\$ 5,760.00	\$ 5,760.00
358	6002	84084	STONECIPHER, KADI	KADI	STONECIPHER	1	120	9/10/2017	12/20/2019	B	F JONES	\$ 12.50	\$ 6,000.00	\$ 6,000.00
358	6099	41843	THROGMARTIN, COREY	COREY	THROGMARTIN	1	155	2/21/2011	12/20/2019	B	F JONES	\$ 17.50	\$ 8,400.00	\$ 8,400.00
358	85	10387	WALTON, RUBY	RUBY	WALTON	1	155	9/5/1998	12/20/2019	B	F CORP	\$ 14.50	\$ 6,960.00	\$ 6,960.00
358	7899	78694	WATTS, ASHLEY	ASHLEY	WATTS	1	155	5/6/2013	12/20/2019	B	F CORP	\$ 12.00	\$ 5,760.00	\$ 5,760.00
358	902	45780	WHITENER, HEATHER	HEATHER	WHITENER	1	155	3/31/2010	12/20/2019	B	F SEARC	\$ 12.00	\$ 5,760.00	\$ 5,760.00
358	599	11857	WILLIAMS, BERTHA	BERTHA	WILLIAMS	1	155	4/15/1999	12/20/2019	B	F CORP	\$ 19.03	\$ 9,134.40	\$ 9,134.40
358	94	31215	JONES, CHRISTINE	CHRISTINE	JONES	1	56	11/26/2018	12/20/2019	S	F CORP	\$ 17.31	\$ 8,308.80	\$ 8,308.80
358	94	75380	ZAMUDIO, SHYNNAH	SHYNNAH	ZAMUDIO	1	155	7/7/2011	12/20/2019	S	F CORP	\$ 17.31	\$ 8,308.80	\$ 8,308.80
358	7815	54593	AMAYA, JEROL	JEROL	AMAYA	1	155	2/15/2006	12/20/2019	w	F CORP	\$ 17.00	\$ 7,140.00	\$ 7,140.00
358	6002	84259	ANDERSON, GABRIELLE	GABRIELLE	ANDERSON	1	103	1/4/2018	12/20/2019	w	p JONES	\$ 10.50	\$ 2,520.00	\$ 2,520.00
358	7815	64259	AZUMARA, LIVINUS	LIVINUS	AZUMARA	1	114	10/16/2017	12/20/2019	w	p CORP	\$ 13.50	\$ 3,240.00	\$ 3,240.00
358	969	66036	BROWN, DETRICK	DETRICK	BROWN	1	155	7/10/2016	12/20/2019	w	F SEARC	\$ 11.25	\$ 4,725.00	\$ 4,725.00
358	901	20676	BURDESS, KATHY	KATHY	BURDESS	1	155	12/3/2015	12/20/2019	w	F SEARC	\$ 10.00	\$ 4,200.00	\$ 4,200.00
358	63	76996	BYRD, ASHLEY	ASHLEY	BYRD	1	2	12/9/2019	12/20/2019	w	p CORP	\$ 9.25	\$ 2,400.00	\$ 2,400.00
358	6003	73902	CANNON, PAMELA	PAMELA	CANNON	1	155	2/20/2012	12/20/2019	w	F JONES	\$ 17.75	\$ 7,455.00	\$ 7,455.00
358	901	83990	CHAGALA, MARNI	MARNI	CHAGALA	1	152	1/25/2017	12/20/2019	w	p SEARC	\$ 12.25	\$ 2,940.00	\$ 2,940.00
358	6003	78452	COSTNER, KRISTIN	KRISTIN	COSTNER	1	155	10/17/2014	12/20/2019	w	p JONES	\$ 10.00	\$ 2,400.00	\$ 2,400.00
358	901	33641	CROWE, ROXANNE	ROXANNE	CROWE	1	46	2/8/2019	12/20/2019	w	F SEARC	\$ 9.50	\$ 4,200.00	\$ 4,200.00
358	6002	83850	DENNEY, RONALD	RONALD	DENNEY	1	88	4/16/2018	12/20/2019	w	p JONES	\$ 10.00	\$ 2,400.00	\$ 2,400.00
358	6002	83782	DENNEY, RONNIE	RONNIE	DENNEY	1	107	12/5/2017	12/20/2019	w	p JONES	\$ 10.00	\$ 2,400.00	\$ 2,400.00
358	6002	85002	DENNEY, SHERRI	SHERRI	DENNEY	1	89	4/10/2018	12/20/2019	w	p JONES	\$ 11.00	\$ 2,640.00	\$ 2,640.00
358	7809	85298	DICKERSON, KAILEY	KAILEY	DICKERSON	1	23	7/15/2019	12/20/2019	w	p CORP	\$ 9.50	\$ 2,400.00	\$ 2,400.00
358	901	69350	DUNBAR, STEPHANIE	STEPHANIE	DUNBAR	1	155	6/23/2008	12/20/2019	w	F SEARC	\$ 17.25	\$ 7,245.00	\$ 7,245.00
358	114	76198	FISHER, MEGAN	MEGAN	FISHER	1	155	12/12/2011	12/20/2019	w	F CORP	\$ 12.50	\$ 5,250.00	\$ 5,250.00
358	901	66925	GAMMONS, PAULA	PAULA	GAMMONS	1	155	7/2/2007	12/20/2019	w	F SEARC	\$ 17.50	\$ 7,350.00	\$ 7,350.00
358	6002	38487	GOODRUM, AMY	AMY	GOODRUM	1	46	2/5/2019	12/20/2019	w	p JONES	\$ 10.25	\$ 2,460.00	\$ 2,460.00
358	7809	85618	GRAY, CEDRICK	CEDRICK	GRAY	1	37	4/1/2019	12/20/2019	w	p CORP	\$ 9.50	\$ 2,400.00	\$ 2,400.00
359	1216	65200	GURNSEY, MONICA	MONICA	GURNSEY	1	155	10/21/2013	12/20/2019	w	F JONES	\$ 17.75	\$ 7,455.00	\$ 7,455.00
359	7809	84470	HAYES, JAY	JAY	HAYES	1	87	4/24/2018	12/20/2019	w	p CORP	\$ 12.75	\$ 3,060.00	\$ 3,060.00
359	6002	77868	HENSLEY, KATHERINE	KATHERINE	HENSLEY	1	15	9/9/2019	12/20/2019	w	p JONES	\$ 11.50	\$ 2,760.00	\$ 2,760.00
359	6002	85191	HOLMES, DESARAY	DESARAY	HOLMES	1	28	6/10/2019	12/20/2019	w	p JONES	\$ 10.00	\$ 2,400.00	\$ 2,400.00
359	7809	35412	JACKSON, LAQUISHA	LAQUISHA	JACKSON	1	40	3/18/2019	12/20/2019	w	p CORP	\$ 9.50	\$ 2,400.00	\$ 2,400.00
359	1208	79902	JACKSON, ALISON	ALISON	JACKSON	1	155	6/12/2014	12/20/2019	w	p JONES	\$ 14.00	\$ 3,360.00	\$ 3,360.00
359	813	15294	JEFFERSON, TEHRELL	TEHRELL	JEFFERSON	1	155	10/17/2002	12/20/2019	w	F CORP	\$ 13.00	\$ 5,460.00	\$ 5,460.00
359	63	85853	JONES, ARNELL	ARNELL	JONES	1	2	12/9/2019	12/20/2019	w	p CORP	\$ 9.25	\$ 2,400.00	\$ 2,400.00
359	6002	80053	JONES, CHASTIEE	CHASTIEE	JONES	1	17	8/28/2019	12/20/2019	w	p JONES	\$ 9.25	\$ 2,400.00	\$ 2,400.00
359	6002	85080	LISKO, DANIELLE	DANIELLE	LISKO	1	81	6/4/2018	12/20/2019	w	p JONES	\$ 10.25	\$ 2,460.00	\$ 2,460.00
359	113	65901	LONG, JENNIFER	JENNIFER	LONG	1	155	8/18/2010	12/20/2019	w	F CORP	\$ 20.00	\$ 8,400.00	\$ 8,400.00
359	813	4561	MCMULLEN, OWEN	OWEN	MCMULLEN	1	59	11/9/2018	12/20/2019	w	F CORP	\$ 10.75	\$ 4,515.00	\$ 4,515.00
359	6002	85065	MURPHY, TIAUNA	TIAUNA	MURPHY	1	83	5/22/2018	12/20/2019	w	p JONES	\$ 10.50	\$ 2,520.00	\$ 2,520.00
359	6002	85782	NELSON, SIERRA	SIERRA	NELSON	1	10	10/15/2019	12/20/2019	w	p JONES	\$ 10.00	\$ 2,400.00	\$ 2,400.00
359	903	45921	PERRY, CHARLES	CHARLES	PERRY	1	73	8/1/2018	12/20/2019	w	p SEARC	\$ 9.25	\$ 2,400.00	\$ 2,400.00
359	901	83588	PERRY, LAURA	LAURA	PERRY	1	128	7/13/2017	12/20/2019	w	F SEARC	\$ 10.50	\$ 4,410.00	\$ 4,410.00
359	902	85658	REID, NICOLE	NICOLE	REID	1	21	7/28/2019	12/20/2019	w	F SEARC	\$ 10.00	\$ 4,200.00	\$ 4,200.00
359	7815	74245	RICE, AMBER	AMBER	RICE	1	155	8/19/2012	12/20/2019	w	F CORP	\$ 18.00	\$ 7,560.00	\$ 7,560.00
359	6003	47192	ROSE, LONNA	LONNA	ROSE	1	155	1/6/2004	12/20/2019	w	F JONES	\$ 15.00	\$ 6,300.00	\$ 6,300.00
359	6003	85848	SMITH, BRANDY	BRANDY	SMITH	1	3	12/2/2019	12/20/2019	w	p JONES	\$ 9.25	\$ 2,400.00	\$ 2,400.00
359	903	79362	STIEL, DAISY	DAISY	STIEL	1	57	11/22/2018	12/20/2019	w	F SEARC	\$ 10.25	\$ 4,305.00	\$ 4,305.00
359	6002	85831	STRINGER, JOSHUA	JOSHUA	STRINGER	1	5	11/20/2019	12/20/2019	w	p JONES	\$ 10.00	\$ 2,400.00	\$ 2,400.00
359	105	6993	THOMASON, SHELLY	SHELLY	THOMASON	1	155	1/7/2004	12/20/2019	w	F CORP	\$ 19.00	\$ 7,980.00	\$ 7,980.00
359	7809	81908	TODD, KRYSTAL	KRYSTAL	TODD	1	87	4/23/2018	12/20/2019	w	p CORP	\$ 9.25	\$ 2,400.00	\$ 2,400.00
359	827	4109	UNDERWOOD, LARRY	LARRY	UNDERWOOD	1	155	6/14/1999	12/20/2019	w	F CORP	\$ 15.00	\$ 6,300.00	\$ 6,300.00
359	113	12340	WEEKS, SHERRY	SHERRY	WEEKS	1	155	1/12/2000	12/20/2019	w	F CORP	\$ 16.75	\$ 7,035.00	\$ 7,035.00
359	114	45037	WELCH, KIANA	KIANA	WELCH	1	10	10/14/2019	12/20/2019	w	p CORP	\$ 9.25	\$ 2,400.00	\$ 2,400.00
359	1216	25854	WEST, ASHLEY	ASHLEY	WEST	1	155	9/8/2004	12/20/2019	w	F JONES	\$ 18.00	\$ 7,560.00	\$ 7,560.00
359	6003	73448	WEST, ANDREW	ANDREW	WEST	1	28	6/10/2019	12/20/2019	w	p JONES	\$ 12.00	\$ 2,880.00	\$ 2,880.00
359	105	77317	WILLIAMS, CHANELL	CHANELL	WILLIAMS	1	155	6/1/2015	12/20/2019	w	F CORP	\$ 10.50	\$ 4,410.00	\$ 4,410.00
359	902	84734	WILMOTH, ROBERT	ROBERT	WILMOTH	1	5	11/21/2019	12/20/2019	w	p SEARC	\$ 9.25	\$ 2,400.00	\$ 2,400.00
359	487	56895	WILSON, LILLIAN	LILLIAN	WILSON	1	155	6/7/2011	12/20/2019	w	F JONES	\$ 10.00	\$ 4,200.00	\$ 4,200.00
359	6003	56893	WILSON, WALLIS	WALLIS	WILSON	1	155	4/6/2005	12/20/2019	w	F JONES	\$ 17.50	\$ 7,350.00	\$ 7,350.00
359	7809	68068	WOOD, JANA	JANA	WOOD	1	155	10/3/2010	12/20/2019	w	F CORP	\$ 15.25	\$ 6,405.00	\$ 6,405.00
359	7809	41337	WOODS, JOHNATHAN	JOHNATHAN	WOODS	1	37	4/1/2019	12/20/2019	w	p CORP	\$ 10.25	\$ 2,460.00	\$ 2,460.00
360	903	81877	WYMAN, REBEKAH	REBEKAH	WYMAN	1	155	11/22/2015	12/20/2019	w	F SEARC	\$ 13.00	\$ 5,460.00	\$ 5,460.00
360	6003	80912	YASEVICH, JOHNATHAN	JOHNATHAN	YASEVICH	1	155	1/8/2015	12/20/2019	w	F JONES	\$ 16.00	\$ 6,720.00	\$ 6,720.00